

Patrick G. Byrne, Esq. (NV # 7636)  
Richard C. Gordon (NV # 9036)  
Paul Swenson Prior, Esq. (NV # 9324)  
Theresa L. Guerra, Esq. (NV # 15235)  
**SNELL & WILMER L.L.P.**  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, NV 89169  
Telephone: (702) 784-5200  
Facsimile: (702) 784-5252  
Email: [pbyrne@swlaw.com](mailto:pbyrne@swlaw.com)  
[rgordon@swlaw.com](mailto:rgordon@swlaw.com)  
[sprior@swlaw.com](mailto:sprior@swlaw.com)  
[tguerra@swlaw.com](mailto:tguerra@swlaw.com)

*Attorneys for Defendants City of Henderson,  
Debra March, Richard Derrick, Bristol Ellington,  
Nicholas Vaskov and Kristina Escamilla Gilmore*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LATESHA WATSON,  
  
Plaintiff,

v.

CITY OF HENDERSON; BRISTOL  
ELLINGTON; KEVIN ABERNATHY;  
KENNETH KERBY; DEBRA MARCH;  
RICHARD DERRICK; RICHARD  
MCCANN; NICK VASKOV; KRISTINA  
GILMORE; DOES I through X, inclusive,  
  
Defendants.

Case No. 2:20-cv-01761-APG-BNW

**STIPULATION AND ORDER TO EXTEND  
BRIEFING DEADLINES**

This Stipulation is entered into by and among Plaintiff, Latesha Watson (“Plaintiff,” or “Watson”), and Defendants City of Henderson, Debra March, Richard Derrick, Bristol Ellington, Nicholas Vaskov, and Kristina Escamilla Gilmore (collectively, the “City Defendants,” and together with Plaintiff, the “Parties”), by and through their respective undersigned counsel based on the following:

WHEREAS, on September 22, 2020, Plaintiff filed a Complaint and Jury Demand;

1 WHEREAS, on December 18, 2020, Defendants Nicholas Vaskov and Kristina Escamilla  
 2 Gilmore (“City Attorney Defendants”) filed a Special Motion to Dismiss Pursuant to NRS 41.660  
 3 (Dkt. 35) (the “Anti-SLAPP Motion”);

4 WHEREAS, on December 18, 2020, the City Defendants filed a Motion to Dismiss  
 5 Complaint (Dkt. 36) (“City Motion to Dismiss”);

6 WHEREAS, on February 16, 2021, Plaintiff filed a Response to the City Motion to  
 7 Dismiss (Dkt. 47) (“Plaintiff’s Response to City Motion to Dismiss”);

8 WHEREAS, on February 16, 2021, Plaintiff filed a Response to the Anti-SLAPP Motion  
 9 (Dkt. 48) (“Plaintiff’s Response to Anti-SLAPP Motion”);

10 WHEREAS, on February 16, 2021, Plaintiff filed a Motion to Amend Complaint (Dkt. 49)  
 11 (“Motion to Amend”);

12 WHEREAS, on February 16, 2021, Plaintiff filed a Motion for Leave to Perform  
 13 Discovery (Dkt. 50) (“Motion for Leave to Perform Discovery”);

14 WHEREAS, the deadline for the City Attorney Defendants to file a reply in support of the  
 15 Anti-SLAPP Motion is February 23, 2021;

16 WHEREAS, the deadline for the City Defendants to file a reply in support of the City  
 17 Motion to Dismiss is February 23, 2021;

18 WHEREAS, the deadline for the City Attorney Defendants and the City Defendants to  
 19 respond to Plaintiff’s Motion to Amend and the Motion for Leave to Perform Discovery is March  
 20 2, 2021;

21 WHEREAS, the deadline for Plaintiff to file a reply in Support of the Motion to Amend  
 22 and the Motion for Leave to Perform Discovery is March 9, 2021.

23 NOW, THEREFORE, subject to Court approval, the Parties agree to extend the briefing  
 24 deadlines described above as follows:

- 25 1. The deadline for the City Attorney Defendants to file a reply in support of the Anti-  
 26 SLAPP Motion shall be extended from February 23, 2021 to March 25, 2021;
- 27 2. The deadline for the City Defendants to file a reply in support of the City Motion  
 28 to Dismiss shall be extended from February 23, 2021 to March 25, 2021;

Snell & Wilmer  
LLP  
LAW OFFICES  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, Nevada 89169  
702.784.5200

3. The deadline for the City Attorney Defendants and the City Defendants to respond to Plaintiff's Motion to Amend and the Motion for Leave to Perform Discovery shall be extended from March 2, 2021 to March 25, 2021; and

4. The deadline for Plaintiff to file a reply in support of the Motion to Amend and the Motion for Leave to Perform Discovery shall be extended from March 9, 2021 to April 8, 2021.

This request for an extension is made in good faith and not for the purposes of delay.

IT IS SO STIPULATED.

DATED this 23rd day of February 2021.

DATED this 23rd day of February 2021.

SNELL & WILMER L.L.P.

COOK & KELESIS, LTD.

/s/ Patrick G. Byrne

/s/ Marc P. Cook

Patrick G. Byrne (NV Bar No. 7636)  
Richard C. Gordon (NV Bar No. 9036)  
Paul Swenson Prior, Esq. (NV Bar No. 9324)  
Theresa L. Guerra (NV Bar No. 15235)  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, Nevada 89169  
Phone: (702) 784-5200  
Fax: (702) 784-5252

Marc P. Cook (NV Bar No. 004574)  
George P. Kelesis (NV Bar No. 000069)  
Julie L. Sanpei (NV Bar No. 005479)  
517 South Ninth Street  
Las Vegas, Nevada 89101  
Phone: (702) 737-7702  
Fax: (702) 737-7712

*Attorneys for Plaintiff, Latesha Watson*

*Attorneys for Defendants, City of Henderson,  
Debra March, Richard Derrick, Bristol  
Ellington, Nicholas Vaskov and Kristina  
Escamilla Gilmore*

**ORDER**

**IT IS SO ORDERED.**

DATED: February 23, 2021

  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on February 23, 2021, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND BRIEFING DEADLINES** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED this 23rd day of February 2021.

/s/ Maricris Williams  
An Employee of Snell & Wilmer L.L.P.

4848-4925-4365

Snell & Wilmer

LLP  
LAW OFFICES  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, Nevada 89169  
702.784.5200